

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

AMERISURE INSURANCE COMPANY §
ANDAMERISURE MUTUAL INSURANCE§
§
Plaintiff, §
§
v. §
§
ALVARO LEO, SR. LANCE MCCOOK §
and LATOYA MCCOOK. §
§
Defendant. §

Civil Action No. 5:25-CV-00337-JKP-ESC

DEFENDANTS INITIAL DISCLOSURE STATEMENT

NOW COMES, LANCE MCCOOK and LATOYA MCCOOK, Defendants in the above numbered and styled cause, and serves this, their Rule 26 Initial Disclosure Statement:

DEFENDANT'S RULE 26 INITIAL DISCLOSURES

Defendants Lance McCook and LaToya McCook, pursuant to Federal Rule of Civil Procedure 26(a)(1), hereby submits their initial disclosures. The following disclosures are based upon information reasonably available to Defendants at this time. These disclosures are made subject to, and without waiving Defendants' right to protect from disclosure any and all communications protected by attorney- client privilege and/or the work product doctrine and any information that Lance McCook and LaToya McCook is prohibited from disclosing by applicable law.

FED. R. CIV. P. 26(a)(1)(A)(i): the name, and if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

RESPONSE:

Lance McCook And Latoya McCook
c/o Marco Bass

Ryan Reyna
Marco Bass Law, PLLC
2119 San Pedro Ave
San Antonio, Texas 78212
tel. (210) 239-6944
Fax. (210) 855-3574
Defendants

Amerisure Insurance Company And
Amerisure Mutual Insurance
c/o Harrison H. Yoss
Thompson, Coe Cousins & Irons, LLP
700 North Pearl Street, 25th Floor
Dallas Texas 75201
Tel. (214) 871-8259
Fax. (214) 871-8209
Plaintiff

ALVARO LEOS SR.
13230 Blanco #802 Rd
San Antonio, Tx 78216
Defendant

Officer Jerry L. Miller, ID No. 0410
San Antonio Police Department 315 S.
Santa Rosa Avenue
San Antonio, Texas 78207
Investigating Officer / Department
Responding/Investigating Officers

PERSONS AND ENTITIES WHICH MAY BE IDENTIFIED IN DEFENDANT'S RULE 26 INITIAL DISCLOSURES AND SUBSEQUENT SUPPLEMENTATION.

Plaintiff reserves the right to supplement.

FED. R. CIV. P. 26(a)(1)(A)(ii): a copy of – or a description by category and location – of all documents, electronically stored information and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

RESPONSE:

See attached Bates Labeled document production number McCooks 000001-000237.

Please click on the link below:

<https://www.dropbox.com/scl/fi/6vp9z5prmlmr5p3ca5fdk/McCOOKS-000001-000237.pdf?rlkey=8s3phiqnzvbjpf1ebuq3zcisk&st=5cqd8ow0&dl=0>

FED. R. CIV. P. 26(a)(1)(A)(iii): a computation of any category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered:

RESPONSE:

Defendants at this time only seek a declaratory judgment announcing their rights as it relates to an insurance policy in connection to the underlying lawsuit; however, Defendant reserves the right to contest and object to Plaintiff's calculation of their alleged damages.

FED. R. CIV. P. 26(a)(1)(A)(iv): for inspection and copying as under Rule 34 any insurance agreement under which an insurance business may be liable to satisfy part or all of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

See attached Bates Labeled document production number **McCooks 000001-000237**.

<https://www.dropbox.com/scl/fi/6vp9z5prmlmr5p3ea5fdk/McCOOKS-000001-000237.pdf?rlkey=8s3phiqnzvbjpf1ebuq3zcisk&st=5cyd8ow0&dl=0>

Respectfully submitted,

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**COUNSEL FOR DEFENDANTS
LANCE MCCOOK and LATOYA
MCCOOK**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the 2nd day of June 2025. By the Court E-filing system on Plaintiff's attorney of record as shown below:

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/s/ Marco Bass
MARCO BASS